

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION**

CENTRIPETAL NETWORKS, LLC,)	
)	
Plaintiff,)	No. 2:21-cv-00137-EWH-LRL
)	
vs.)	
)	
PALO ALTO NETWORKS, INC.,)	
)	
Defendant.)	
)	
)	
)	
)	

**DEFENDANT’S MOTION AND MEMORANDUM IN SUPPORT FOR APPROVAL OF
SUPERSEDEAS BOND AND STAY OF ENFORCEMENT OF JUDGMENT**

NOW COMES Defendant Palo Alto Networks, Inc. (“Palo Alto”), by counsel, and pursuant to Rule 62 of the Federal Rules of Civil Procedure, moves this Court to approve the attached supersedeas bond and to stay all proceedings to enforce the judgment entered by this Court on October 3, 2024. Dkt. No. 972.

In support of its Motion, Palo Alto states that the parties have agreed upon the amount of One Hundred Sixty Million Dollars (\$160,000,000.00) as sufficient to cover the judgment amount, any prejudgment interest the Court may award, post-judgment interest, and taxable court costs during the appeal process. The proposed supersedeas bond is issued by Nationwide Mutual Insurance Company, who is authorized to issue surety bonds in the Commonwealth of Virginia and for the United States District Court for the Eastern District of Virginia. A copy of the proposed supersedeas bond is attached hereto as **Exhibit 1**.¹ The original corrected supersedeas bond will

¹ Plaintiff’s counsel aptly noted a typo in the court designation of the proposed bond that will be corrected in the hard copy that will be submitted to the Court.

be filed with the Court on or before November 8, 2024.

Plaintiff consents to the amount and posting of the supersedeas bond and the staying of all further proceedings to enforce the judgment of October 3, 2024, as long as the supersedeas bond remains in place.

WHEREFORE, Defendant Palo Alto Networks, Inc. moves this Court for approval of the supersedeas bond and an Order staying all proceedings to enforce the judgment of October 3, 2024, until further order of this Court.

Dated: November 4, 2024

Respectfully submitted,

By: /s/ Robert W. McFarland

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COUNSEL FOR PALO ALTO NETWORKS, INC.

CERTIFICATE OF SERVICE

I hereby certify that on November 4, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will automatically send notification of electronic filing to all counsel of record.

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